

ATTACHMENT B

AFFIDAVIT OF FEDERAL BUREAU OF INVESTIGATION
TASK FORCE OFFICER CHARLES "CHIP" ROOT

I, Charles Root, Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), being duly sworn, do state the following:

1. I have been employed as a police officer with the City of Joplin, Missouri, since November 2004, and a sworn law enforcement officer since 1994. I am currently a TFO with the FBI, as well as a member of the Southwest Missouri Cyber Crimes Task Force (SMCCTF) in Joplin, Missouri. As a TFO, I have been assigned to investigate computer crimes, including violations against children. I have gained expertise in the conduct of such investigations through training in seminars, classes, and everyday work related to conducting these types of investigations. I have attended training provided by the FBI Cyber Crime Division, the FBI's Regional Computer Forensic Laboratory, and the Missouri Internet Crimes Against Children (ICAC) Task Force. I have written, executed, and assisted in over 200 search warrants on the state and federal level. As a TFO with the FBI, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. This affidavit is submitted in support of a criminal complaint charging Charles Ward KUENTZEL 2nd with violation of Title 18, United States Code, Sections 2251(a) and 2251(e), Sexual Exploitation of Children.

3. The statements in this affidavit are based on my personal observations, my investigation of this matter and information obtained from other law enforcement officers and

witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth the facts necessary to establish probable cause to believe that Charles Ward KUENTZEL 2nd has violated 18 U.S.C. §§ 2251(a) and 2251(e), Sexual Exploitation of Children.

STATUTORY AUTHORITY

4. Title 18, United States Code, Section 2251(a) prohibits a person from employing, using, persuading, inducing, enticing or coercing a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce, or if such visual depiction actually was transported in or affecting interstate commerce.

DEFINITIONS

5. The following definitions apply to this Affidavit:

a. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

b. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

PROBABLE CAUSE

6. On April 21, 2021, Special Agent Raymond Nichols (SA Nichols), with the Detroit Division of the FBI, received a request for assistance with an investigation originating with the

Canton Police Department (CPD) in Canton, Michigan. CPD had received a report from a mother who stated that her minor female child, Jane Doe, was in an inappropriate online relationship with an adult male. Jane Doe's mother provided CPD with screenshots of parts of Jane Doe's communications with the adult male. In some of the screenshots the adult male's face was fully visible.

7. Jane Doe's mother reported that Jane Doe had been chatting with an adult male on Discord, which is an Internet based social media application, and had sent the adult male nude images of herself. The adult male used Discord screenname "WeAreGrid". Per the mother, Jane Doe told "WeAreGrid" that she was 17 years old, and "WeAreGrid" told Jane Doe that his name was "Charlie Kuent" and he was a 25 year old from Missouri. Jane Doe's mother described "Charlie Kuent" as a white male with red hair. Jane Doe's mother provided Jane Doe's username and password to Discord and gave consent to search the account. CPD was not able to review the account because it had been deleted.

8. On or about April 21, 2021, SA Nichols reviewed the screenshots provided by Jane Doe's mother. Within the screenshots he observed several images sent from "WeAreGrid" that depicted an adult white male with red hair and red beard. In most of those images the male was wearing clear lens eyeglasses. In one chat with Jane Doe, "WeAreGrid" sent her a message which stated, "I really wanted to make you get on your knees and show your ass to the camera and rub your clit and asshole while I pounded your pussy". Jane Doe and "WeAreGrid" appeared to engage in additional sexual conversations. Based on the screenshots it also appeared that the two engaged in video chats.

9. While reviewing the screenshots provided by Jane Doe's mother, SA Nichols observed two images sent from "WeAreGrid" which depicted a semi-erect adult penis. The adult

appeared to have red pubic hair and was wearing what appeared to be a ring on his thumb. SA Nichols also observed an image sent from Jane Doe to “WeAreGrid” which appeared to depict a female spreading her labia on her bare vagina with her fingers. In response to the image sent from Jane Doe, “WeAreGrid” responded, “god yes, thats my tight wet gooey pussy ❤ cant wait to pound ❤”.

10. On April 22, 2021, SA Nichols conducted database searches for “Charlie Kuent” and was able to find a partial name match with Charles Ward KUENTZEL 2nd, date of birth XX/XX/1995, with a home address of 520 Pine Street, Carthage, Missouri 64836. He then obtained KUENTZEL’s Missouri driver’s license photograph and compared it to the screenshots provided by Jane Doe’s mother. KUENTZEL appeared to be the same individual who had used Discord account “WeAreGrid” to communicate with Jane Doe.

11. On April 22, 2021, SA Nichols obtained a criminal history for KUENTZEL. His criminal history included a 2018 arrest for kidnapping out of Jasper County Missouri, a 2018 arrest for unlawful restraint out of the Wheeler County Texas Sheriff’s Office, and a 2018 guilty plea to harboring a runaway child in the 31st District Court in Texas.

12. On May 13, 2021, Jane Doe was interviewed by an FBI Child and Adolescent Forensic Interviewer in Southgate, Michigan. Jane Doe disclosed that she had met “Charlie” in a public Discord game server around the time that the school year started. Jane Doe believed that “Charlie” knew what grade she was in at school because they talked about it. Jane Doe did not recall telling “Charlie” how old she was. Eventually Jane Doe and “Charlie” became intimate and began having sexual conversations. Jane Doe had sent “Charlie” sexual images of herself, but no videos. Occasionally Jane Doe and “Charlie” would video chat and show each other “different parts of our bodies”. Jane Doe identified “Charlie’s” Discord account as “WeAreGrid”.

13. During the interview of Jane Doe, she was shown several photographs. One of those photographs was a screen shot of a Discord chat between Jane Doe and “WeAreGrid”. The screenshot included a message from “WeAreGrid” which stated, “I really wanted to make you get on your knees and show your ass to the camera and rub your clit and asshole while I pounded your pussy” and “its alright if you dont remember...how well I fucked you...”. Jane Doe indicated that was a reference to a video chat they had engaged in the night before. Jane Doe was shown photographs sent from “WeAreGrid” which depicted a male with red hair and clear lens eyeglasses as well as an image of a semi-erect adult penis with red pubic hair. Jane Doe identified the male in the photographs as “Charlie”.

14. In total, Jane Doe was asked to identify a total of nine images, which were discovered in her Discord application. One image depicted a person believed to be Jane Doe. The minor victim identified in the image as herself. Another image was a closeup image of a female’s face, with her mouth open. Jane Doe identified herself in the image, and said she was instructed to pose her mouth that way by “WeAreGrid”. This image includes the text from “WeAreGrid”, “I want you in my mouth baby,” “Will I was just floppin it around and the camera making me sad made me less horny:P,” “Mmmm yes please,” “Show me that little fucktoy mouth <3.” A third image depicted a closeup image of a female using her hand to spread her labia with her fingers. Jane Doe identified the person depicted in this image as herself and stated that she was at 17 years old in that image. Jane Doe identified the two persons depicted in another image, as herself and “Charlie.” Jane Doe was also shown images of what appears to be an adult male holding his erect penis with his left hand. A ring is observed on the thumb of the male’s left hand. Jane Doe identified the person depicted in this image as “Charlie”.

15. Jane Doe was asked during the interview how her Discord account was deleted. Jane Doe's password was a random string of numbers that she liked. Jane Doe had discussed those numbers with "WeAreGrid". Jane Doe did not discuss deleting her account with "WeAreGrid" but, right before Jane Doe's mother took her phone from her, she told "WeAreGrid" that her mother had found out about their relationship. Jane Doe believed it was possible that "WeAreGrid" deleted her account.

16. Based on the above, SA Nichols forwarded a lead to Kansas City Division FBI, requesting assistance in furthering this investigation, which was assigned to this Affiant.

17. On August 9, 2021, your Affiant searched the Missouri Uniform Law Enforcement System (MULES), for vehicles registered to KUENTZEL. This Affiant found that a 2005 Toyota Sienna, bearing a Missouri handicap license HM68F was registered to KUENTZEL. The registered address for this vehicle is 520 Pine, Carthage, Jasper County, Missouri. A MULES search for KUENTZEL's Missouri driver's license showed that KUENTZEL's registered address was 520 Pine Street, Carthage, Missouri 64836. This address is located in the Western District of Missouri.

18. On August 18, 2021, a federal search warrant was granted for 520 Pine Street, Carthage, Jasper County, Missouri. The warrant was executed on August 26, 2021. During the execution of the search warrant, Charles Ward KUENTZEL 2nd was detained as he was attempting to leave for work. He was escorted to this Affiant's vehicle for an interview. While speaking with KUENTZEL, he declined to provide the passcode for any of his electronic devices.

19. While conducting the interview, forensic examiners conducted forensic previews of KUENTZEL's Samsung Galaxy A52 cellular telephone. A 128GB SP microSD card was inserted into his Samsung Galaxy cellular telephone. Although this cellular device was not able

to be examined at the time, forensic examiners were able to examine the 128GB SP microSD card. During the review of this microSD card, examiners discovered numerous images depicting both the minor victim, as well as KUENTZEL. Many of the images appeared to be the same images provided to Detroit FBI agents by Jane Doe's mother. The images included closeup images of Jane Doe's face, as well as her breasts and vagina. The images depicted KUENTZEL, include closeup images of his face, as well as closeup images of an adult male holding his erect penis. In some of these images, it appeared that KUENTZEL was wearing a ring that appeared to be similar to the one previously described by Detroit FBI.

20. After discovering the images of Jane Doe on the 128GB SP microSD card located in KUENTZEL's cellular telephone, KUENTZEL was informed he was under arrest. While placing handcuffs on his wrists, this Affiant observed a unique ring on the thumb of KUENTZEL's left hand. The condition of KUENTZEL's hands, including the placement of the ring were photographed. KUENTZEL was informed he would not be allowed to keep this ring while in custody. He was asked to remove the ring from his hand, and he complied. The Affiant later examined the silver in color ring. The ring appears to be a coiled snake. The ring was later compared to both the images provided by Detroit FBI, and the images observed on the microSD card, and they appear to be the same ring.

21. According to FBI agents in Detroit, the relationship between KUENTZEL and Jane Doe began around the beginning of the school year, which was in September 2020.

CONCLUSION

22. Based upon the above facts, this affiant believes there is probable cause in support of a criminal complaint against Charles Ward KUENTZEL 2nd for violation Title 18, United States Code, Section 2251, that is, sexual exploitation of children.



Charles Root
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me via telephone this 27th day of August, 2021.



HONORABLE DAVID P. RUSH
Chief United States Magistrate Judge
Western District of Missouri